

(Counsel for the parties listed on next page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COLLETTE DELBRIDGE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KMART CORPORATION

Defendants.

No. 11-02575-WHA

**STIPULATION TO ALLOW TWO EXPERT
DEPOSITIONS NOTWITHSTANDING
EXPERT DISCOVERY CUT-OFF;
~~PROPOSED~~ ORDER**

Courtroom: 8, 19th Flr.

Judge: Hon. William H. Alsup

Complaint Filed April 11, 2011

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STIPULATION

Plaintiff Collette Delbridge and defendant Kmart Corporation, by and through their respective undersigned counsel, hereby stipulate as follows:

1. The cut-off for expert discovery in this action currently is July 5, 2013.

2. The two experts yet to be deposed in this action are the plaintiff's expert, Dr. Gary Bakken, whose offices are in Arizona; and the defendant's expert, Dr. Jeffrey Fernandez, whose offices are in Virginia.

3. In order to accommodate the conflicting schedules of the experts and counsel, the parties agree and respectfully ask the Court to order that, notwithstanding the expert discovery cut-off in the action, the plaintiff's expert, Dr. Gary Bakken, may be deposed on August 12, 2013, and the defendant's expert, Dr. Jeffrey Fernandez, may be deposed on August 13, 2013.

Dated: July 2, 2013.

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Attorneys for Plaintiff

Dated: July 2, 2013.

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By: /s/ Jeffrey D. Wohl
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PROPOSED ORDER

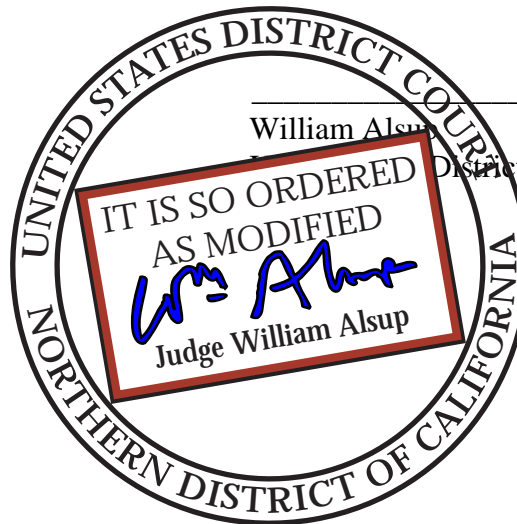
On the stipulation of the parties, and good cause appearing therefor,

IT IS ORDERED that notwithstanding the July 5, 2013, expert discovery cut-off in this action, plaintiff's expert, Dr. Gary Bakken, may be deposed on August 12, 2013, and defendant's expert Dr. Jeffrey Fernandez, may be deposed on August 13, 2013.

This extension may not be used as a basis for changing other deadlines, including deadlines for expert reports and the September 23 trial date.

IT IS SO ORDERED

Date: July 9, 2013.



William Alsup
District Judge